

Mark E. Miller  
Bernard P. Bell  
MILLER FRIEL, PLLC  
2445 M Street, NW, Suite 910  
Washington, DC 20037  
Tel: (202) 760-3160

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

MERCON B.V.,

Debtor.

Chapter 11

Case No. 23-11947 (MEW)

**NOTICE OF HEARING REGARDING APPLICATION FOR ADMINISTRATIVE  
EXPENSE CLAIM OF MILLER FRIEL, PLLC**

**PLEASE TAKE NOTICE** that on August 30, 2024, Miller Friel, PLLC filed the *Application for Administrative Expense Claim of Miller Friel, PLLC* (the “**Application**”).

**PLEASE TAKE FURTHER NOTICE** that a hearing regarding the Application will be held before the Honorable Michael E. Wiles, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, Courtroom 617, One Bowling Green, New York, New York 10004 (the “**Bankruptcy Court**”) at a hearing scheduled for **October 9, 2024, at 11:00 a.m. (Eastern Time)** (the “**Hearing**”), or at such other time as the Bankruptcy Court may determine.

**PLEASE TAKE FURTHER NOTICE** that the deadline to respond or object to the relief requested in the Application is **October 2, 2024, at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”).

**PLEASE TAKE FURTHER NOTICE** that any responses or objections (“**Objections**”) to the Application must:

- (a) be in writing;
- (b) specify the name of the objecting party and state with specificity the basis of the Objection(s) and the specific grounds therefor;
- (c) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York;
- (d) be filed with the Court on the docket of *In re Mercon B.V.*, Case No. 23-11947 (MEW); and
- (e) be served upon (a) the Chambers of the Honorable Michael E. Wiles, United States Bankruptcy Judge, Bankruptcy Court for the Southern District of

New York, One Bowling Green, New York, New York 10004-1408; (b) counsel to the Debtors, Baker & McKenzie LLP, 452 Fifth Avenue, New York, New York 10018, Attn: Blaire Cahn, Esquire ([blaire.cahn@bakermckenzie.com](mailto:blaire.cahn@bakermckenzie.com)) and 1111 Brickell Avenue, 10<sup>th</sup> Floor, Miami, Florida 33130, Attn: Paul J. Keenan, Jr., Esquire, John R. Dodd, Esquire and Reginald Sainvil, Esquire ([paul.keenan@bakermckenzie.com](mailto:paul.keenan@bakermckenzie.com); [john.dodd@bakermckenzie.com](mailto:john.dodd@bakermckenzie.com); and [reginald.sainvil@bakermckenzie.com](mailto:reginald.sainvil@bakermckenzie.com)); (c) co-counsel to the Debtors, Chipman Brown Cicero & Cole, LLP, 501 Fifth Avenue, 15<sup>th</sup> Floor, New York, New York 10017, Attn: Adam D. Cole, Esquire ([cole@chipmanbrown.com](mailto:cole@chipmanbrown.com)) and 1313 North Market Street, Suite 5400, Wilmington, Delaware 19801, Attn: Robert A. Weber, Esquire ([weber@chipmanbrown.com](mailto:weber@chipmanbrown.com)); (d) counsel to the Official Committee of Unsecured Creditors, O'Melveny & Myers LLP, 2801 North Harwood Street, Suite 1600, Dallas, Texas 75201, Attn: Gregory M. Wilkes, Esquire and Scott P. Drake, Esquire ([gwilkes@omm.com](mailto:gwilkes@omm.com) and [sdrake@omm.com](mailto:sdrake@omm.com)); (e) Office of the United States Trustee, Alexander Hamilton Custom House, One Bowling Green, Suite 534, New York, New York 10004-1408, Attn: Daniel Rudewicz, Esquire ([Daniel.rudewicz@usdoj.gov](mailto:Daniel.rudewicz@usdoj.gov)) (f) Miller Friel, PLLC, 2445 M Street, NW, Suite 910, Washington, DC 20037, Attn: Mark E. Miller and Bernard P. Bell ([millerm@millerfriel.com](mailto:millerm@millerfriel.com) and [bellb@millerfriel.com](mailto:bellb@millerfriel.com)), so as to be received no later than the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that if no Objections are timely filed and served with respect to the Application, the Court may enter an order with no further notice or opportunity to be heard.

**PLEASE TAKE FURTHER NOTICE** that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing.

Dated: August 30, 2024  
New York, New York

**MILLER FRIEL, PLLC**

/s/ Mark E. Miller

Mark E. Miller  
Bernard P. Bell  
Miller Friel, PLLC  
2445 M Street, NW  
Suite 910  
Washington, DC 20037  
Telephone: (202) 760-3160  
Email: millerm@millerfriel.com  
bellb@millerfriel.com